

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
 v. : 1:19CR 147 -1  
 :  
 LAKHDEEP SINGH DEOL :

The Grand Jury charges:

COUNT ONE

From on or about December 17, 2018, continuing up to and including on or about March 6, 2019, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle District of North Carolina, LAKHDEEP SINGH DEOL, with the intent to harass and intimidate C.R., did use any interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any other facility of interstate commerce and foreign commerce to engage in a course of conduct that attempted to cause and would be reasonably expected to cause substantial emotional distress to C.R.; in violation of Title 18, United States Code, Sections 2261A(2)(b) and 2261(b).

COUNT TWO

From on or about December 17, 2018, continuing up to and including on or about March 6, 2019, the exact dates to the Grand Jurors unknown, in the

County of Guilford, in the Middle District of North Carolina, LAKHDEEP SINGH DEOL, with the intent to harass and intimidate M.C., did use any interactive computer service, electronic communication service, electronic communication system of interstate commerce, and any other facility of interstate commerce and foreign commerce to engage in a course of conduct that attempted to cause and would be reasonably expected to cause substantial emotional distress to M.C.; in violation of Title 18, United States Code, Sections 2261A(2)(b) and 2261(b).

#### COUNT THREE

On or about February 6, 2019, in the County of Guilford, in the Middle District of North Carolina, LAKHDEEP SINGH DEOL, did transmit in interstate and foreign commerce any communication containing any threat to injure the person of another, whose initials are C.R.; in violation of Title 18, United States Code, Section 875(c).

#### COUNT FOUR

From on or about February 28, 2019, continuing up to and including on or about March 11, 2019, the exact dates to the Grand Jurors unknown, in the County of Guilford, in the Middle District of North Carolina, and elsewhere, LAKHDEEP SINGH DEOL, with intent to extort from a corporation, money and other things of value, knowingly transmitted in interstate commerce from the State of North Carolina to the State of California, any communication

containing any threat to injure the person of another; in violation of Title 18,  
United States Code, Section 875(b).

DATED: March 25, 2019

MATTHEW G.T. MARTIN  
United States Attorney

  
BY: GRAHAM T. GREEN  
Assistant United States Attorney

A TRUE BILL:

  
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FOREPERSON